



Ronda P. Bayer
Associate General Counsel

1101 South Third Street, Minneapolis, MN 55402
612-375-7306 Fax 612-375-7313

October 20, 2008

EPA Region 5 Records Ctr.



365969

Federal Express

U.S. Environmental Protection Agency
Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Request for Information Pursuant to Section 104 of CERCLA, 42
U.S.C. §9604(e); The Chemical Recovery Systems Site, Elyria, Ohio

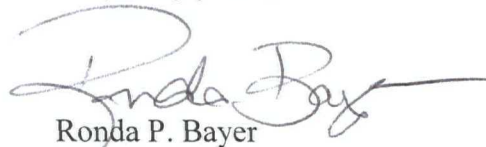
Dear Ms. Sheppard-Johnson:

In a recent review of the EPA's website for the Chemical Recovery Site ("CRS"), The Valspar Corporation ("Valspar") observed that its April 26, 2001 response to the EPA's request was not identified as received.

For your information, enclosed please find a copy of Valspar's prior Response to the Request for Information.

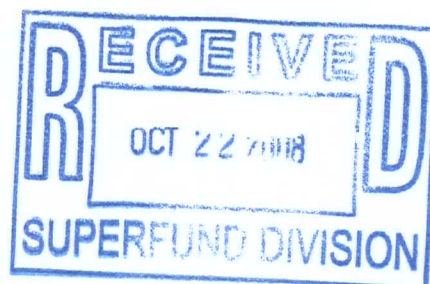
Feel free to call me with any questions.

Very truly yours,



Ronda P. Bayer

Enclosure





Ronda P. Bayer
Associate General Counsel

1101 South Third Street, Minneapolis, MN 55415
612-375-7306 FAX 612-375-7313

April 26, 2001

AIRBORNE EXPRESS

U.S. Environmental Protection Agency
Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Blvd.
Chicago, IL 60604

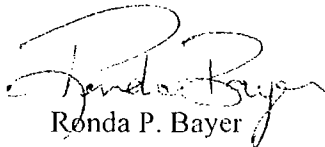
RE: Request for Information Pursuant to Section 104(e) of CERCLA, 42 U.S. C.
§9604(e); The Chemical Recovery Systems Site, Elyria, Ohio

Dear Ms. Sheppard-Johnson:

Enclosed you will find the Valspar Corporation's Responses to the Request for Information Regarding the Chemical Recovery Systems Site, Elyria, Ohio.

Feel free to call me with questions.

Very truly yours,



Ronda P. Bayer

Enc.

04101



**THE VALSPAR CORPORATION'S ("Valspar") RESPONSE
TO THE REQUEST FOR INFORMATION REGARDING
THE CHEMICAL RECOVERY SYSTEMS SITE, ELYRIA, OHIO**

1. Identify all persons consulted in the preparation of the answers to these questions.

Joel Dillingham	Safety, Environmental Manager
Patricia Aungst	Shipping/Receiving. Coordinator I
Donald Clutter	Production Supervisor II
Deborah Miller	Purchasing Coordinator II
Raymond Radigan	Materials Manager III
Dennis Sakal	Traffic Manager
James Sims	Production Technician
Rondal Slaughter	Production Technician
Ellen Stanton	Scheduler II
John Sustersic	Warehouse Supervisor I
Kathleen Whalen	Buyer II
Dennis Wilt	Production Supervisor I

All of the above-named employees are located at Valspar/Plasti-Kote, 1000 Lake Road, Medina, OH 44258

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions and provide copies of all such documents.

Valspar is not in possession of any relevant documents.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons.

None.

4. List the EPA Identification Numbers of the Respondent.

**The EPA Identification Number for the Medina, Ohio facility is
OHD091620369.**

5. Identify the acts or omissions of any person, other than your employees, contractors, or agents that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom at the CRS Site.

Valspar is not in possession of any information responsive to this request.

6. Identify all persons including respondent's employees, who have knowledge or information about the generation, use, treatment, storage, disposal, or other handling of material at or transportation of materials to the Site (operating as Obitts Chemical Company or Chemical Recovery Systems, Inc., at 142 Locust Street, Elyria, Ohio).

None.

7. Describe all arrangements that Respondent may have or may have had with each of the following companies and persons:

- a) Obitts Chemical Company
- b) Russell Obitts
- c) Chemical Recovery Systems, Inc.
- d) Peter Shagena
- e) James Freeman
- f) James "Jim" Jackson
- g) Donald Matthews
- h) Bob Spears
- i) Bill Bromley
- j) Carol Oliver
- k) Nolwood Chemical Company, Inc.
- l) Art McWood
- m) Chuck Nolton
- n) Michigan Recovery System, Inc.
- o) Chemical Recovery Systems of Michigan

To the best of Valspar's knowledge, none.

8. Set forth the dates during which the Respondent engaged in any of the following activities:

- a) generation of hazardous materials which were sent to the CRS Site;

To the best of Valspar's knowledge, none.

- b) transportation of any material to the CRS Site.

To the best of Valspar's knowledge, none.

9. Identify all persons, including yourself, who may have arranged for disposal or treatment, or arranged for transportation for disposal or treatment, of materials, including, but not limited to, hazardous substances, at the CRS Site. In addition, identify the following:



a) The persons with whom you or such other persons made such arrangements;

To the best of Valspar's knowledge, none.

b) Every date on which such arrangements took place;

To the best of Valspar's knowledge, none.

c) For each transaction, the nature of the material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

Not applicable.

d) The owner of the materials or hazardous substances so accepted or transported;

Not applicable.

e) The quantity of the materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;

Not applicable.

f) All tests, analyses, and analytical results concerning the materials;

Not applicable.

g) The person(s) who selected the CRS Site as the place to which the materials or hazardous substances were to be transported;

Not applicable.

h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;

Not applicable.

i) Where the person identified in g., above; intended to have such hazardous substances or materials transported and all evidence of this intent;

Not applicable.

j) Whether the materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment of disposal;

Not applicable.

k) What was actually done to the materials or hazardous substances once they were brought to the CRS Site;

Not applicable.

l) The final disposition of each of the materials or hazardous substances involved in such transactions;

Not applicable.

m) The measures taken by you to determine the actual methods, means, and site of treatment of disposal of the material and hazardous substance involved in each transaction;

Not applicable.

n) The type and number of containers in which the materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the CRS Site, and all markings on such containers;

Not applicable.

o) The price paid for (i) transport, (ii) disposal, or (iii) both of each material and hazardous substance;

Not applicable.

p) All documents containing information responsive to a – o above, or in lieu of identification of all relevant documents, provide copies of all such documents;

None.

q) All persons with knowledge, information, documents responsive to a – p above.

None.

10. Identify all liability insurance policies held by Respondent from 1960 to the present. In identifying such policies, state the name and address of each insurer and of

the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

Valspar acquired Plasti-Kote in 1998. Attached is an insurance schedule from 1998 to the present. These policies contain a pollution exclusion clause.

11. Provide copies of all income tax returns, including all supporting schedules, sent to the Federal Internal Revenue Service in the last five years.

Valspar is publicly held. Attached is a copy of the most recent annual report.

12. If Respondent is a Corporation, respond to the following requests:

a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.

Valspar is publicly held. Attached is a copy of the most recent annual report.

b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service and the Securities and Exchange Commission.

Valspar is publicly held. Attached is a copy of the most recent annual report.

c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own (s) or is (are) responsible for such assets and liabilities.

Valspar is publicly held. Attached is a copy of the most recent annual report.

d) Identify the Parent Corporation and all Subsidiaries of the Respondent.

Valspar is publicly held. Attached is a copy of the most recent annual report.

13. If Respondent is a Partnership, respond to the following requests:

a) Provide copies of the Partnership Agreement;

Not applicable.

b) Provide Respondent's financial statements for the past five years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission;

Not applicable.

c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities;

Not applicable.

d) Identify all subsidiaries of the Respondent.

Not applicable.

14. If Respondent is a Trust, respond to the following requests:

a) Provide all relevant agreements and documents to support this claim.

Not applicable.

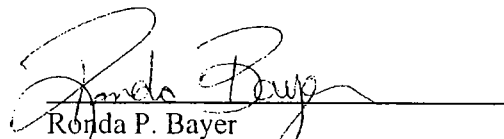
b) Provide Respondent's financial statements for the past five years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission.

Not applicable.

c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities.

Not applicable.

THE VALSPAR CORPORATION



Ronda P. Bayer
Associate General Counsel
1101 So. Third Street
Minneapolis, MN 55415
612-375-7306
612-375-7313 (Fax)

THE VALSPAR CORPORATION
SCHEDULE OF INSURANCE COVERAGE - COMPREHENSIVE GENERAL LIABILITY

PERIOD	INSURER/BROKER	POLICY NUMBER/LIMITS
5/1/97-5/1/98	AIG	
	Broker: The Hays Group Minneapolis, Minnesota TPA: Gallagher Bassett Services Glen Ellyn, IL	Policy #RMGL 143 8457 \$2,000,000 each occurrence and \$4,000,000 aggregate for premises liability. \$2,000,000 each occurrence and aggregate for products.
		\$2,000,000 retention per loss for products liability and general liability.
		Canada: #RMGLA 250 5435 \$2,000,000 each occurrence and aggregate.
5/1/98-5/1/99	AIU	
	Broker: The Hays Group Minneapolis, Minnesota	Policy #80-0263069 Worldwide policy providing \$1,000,000 coverage except in U.S., Canada and Puerto Rico. \$250,000 deductible.
	AIG	
	Broker: The Hays Group Minneapolis, Minnesota TPA: Gallagher Bassett Services Glen Ellyn, IL	Policy #RMGL 113 5945 \$2,000,000 each occurrence and \$4,000,000 aggregate for premises liability. \$2,000,000 each occurrence and aggregate for products.
		\$2,000,000 retention per loss for products liability and general liability.
		Canada: #RMGLA 250 5435 \$2,000,000 each occurrence and aggregate.
	AIU	
	Broker: The Hays Group Minneapolis, Minnesota	Policy #RC - 0362567 Worldwide policy providing \$1,000,000 coverage except in U.S., Canada and Puerto Rico. \$250,000 deductible.



Comprehensive General Liability
Page Nine

PERIOD	INSURER/BROKER	POLICY NUMBER/LIMITS
5/1/99-5/1/00	AIG Broker: The Hays Group Minneapolis, Minnesota TPA: Gallagher Bassett Services Glen Ellyn, IL	Policy #RMGL 612 2716 \$2,000,000 each occurrence and \$4,000,000 aggregate for premises liability. \$2,000,000 each occurrence and aggregate for products.
		\$2,000,000 retention per loss for products liability and general liability.
		Canada: #RMGLA 2505776 \$2,000,000 each occurrence and aggregate.
		Policy #80-0263069 Worldwide policy providing \$1,000,000 coverage except in U.S., Canada and Puerto Rico. \$250,000 deductible.
5/1/00-5/1/01	AIG Broker: Marsh Minneapolis, Minnesota TPA: Gallagher Bassett Services Glen Ellyn, IL	Policy #RMGL 6123477 \$2,000,000 each occurrence and \$4,000,000 aggregate for premises liability. \$2,000,000 each occurrence and aggregate for products.
		\$1,000,000 retention per loss for products liability and general liability.
		Canada: #RMGLA 2505964 \$2,000,000 each occurrence and \$4,000,000 aggregate.
		Policy #80-0263069 Worldwide policy providing \$1,000,000 coverage except in U.S., Canada and Puerto Rico. \$250,000 deductible.



From: Origin ID: MICA (612)375-7359
 Lisa Kahn
 The Valspar Corporation
 1101 S. Third Street
 Box 1461
 Minneapolis, MN 55415



CL5088 10/8/21/24

Ship Date: 20OCT08
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 CAD: 3895559/INET8091
 Account#: S *****

Delivery Address Bar Code

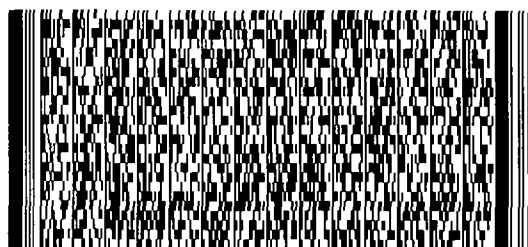


SHIP TO: 312-886-0748

BILL SENDER

Deena Sheppard-Johnson, SR-6J
U.S. Environmental Protection Agency
77 W JACKSON BLVD
REMEDIAL ENFORCEMENT SUPPORT SECTION
CHICAGO, IL 606043511

Ref # 000117000000706970000907
 Invoice #
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 Dept #



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